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June 7, 2018

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Honorable Robert W. Lehrburger
 United States Magistrate Judge
 Daniel Patrick Moynihan
 United States Courthouse
 500 Pearl Street
 New York, New York 10007

Re: *UMB Bank, N.A. as Trustee v. Sanofi*, 15 Civ. 8725 (S.D.N.Y.) (GBD) (RWL); Joint Request for Modifications to the Third Amended Discovery Plan and Scheduling Order

Dear Magistrate Judge Lehrburger:

We represent Sanofi in the above-referenced action and write on behalf of all counsel. The parties have conferred and jointly request that the Third Amended Discovery Plan and Scheduling Order (ECF No. 152) be modified as follows:

Event	Current Date	Modified Date
Service of interrogatories and requests for admission	6/15/18	9/15/18
Non-expert depositions completed	6/29/18	9/28/18
Fact discovery completed	6/29/18	9/28/18
Plaintiff's affirmative expert reports	8/10/18	11/9/18
Defendant's affirmative & rebuttal expert reports	10/5/18	1/4/19
Plaintiff's rebuttal expert reports	11/30/18	3/1/19
Expert depositions completed; close of expert discovery	1/4/19	4/5/19
Motions for Summary Judgment due	2/8/19	5/10/19
Oppositions to Summary Judgment due	3/29/19	6/28/19
Replies to Summary Judgment due	5/3/19	8/2/19
Joint Pre-Trial Order due (unless one or more motions for summary judgment are made, in which case the date for submitting a joint pre-trial order shall be 30 days from the issuance of a written decision on the motion(s))	2/15/19	5/17/19

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A [Proposed] Fourth Amended Discovery Plan and Scheduling Order is attached. The parties note that there is a single item on which they disagree – the number of depositions that each party may take. The parties respectfully request a telephonic or in-person conference with the Court to discuss their respective positions on that issue, which positions are set forth in Paragraph 1.b of the attached proposed order.

* * *

The parties appreciate the Court's consideration of this request. This is the fourth request to modify the Discovery Plan and Scheduling Order.

Respectfully submitted,

/s/ John A. Neuwirth
John A. Neuwirth

cc: Charles A. Gilman, Esq.